

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

MICHEL SOUZA MEDEIROS, *et al.*,

Plaintiffs,

v.

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES, *et al.*,

Defendants.

Civil Action No. 3:22-cv-00723-G

**DEFENDANTS’ SECOND UNOPPOSED MOTION FOR AN
EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND**

In this case, Plaintiffs seek a writ of mandamus to compel U.S. Citizenship and Immigration Services (USCIS) to adjudicate a Form I-140, “Immigrant Petition for Alien Workers,” and Forms I-485, “Application to Register Permanent Residence or Adjust Status.” *See* Doc. 1 at 2, 6–7. On May 26, 2022, the Court granted Defendants’ unopposed motion for a 75-day extension of time to answer or otherwise respond to the complaint, due to a request for evidence that USCIS issued to Plaintiff Michel Souza Medeiros in connection with the Form I-140. *See* Docs. 10, 11. Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Defendants respectfully move the Court for an additional extension of time to answer or otherwise respond to the complaint—an additional 60 days—which would extend the response deadline from August 17, 2022 to October 17, 2022. The reason for this additional extension request is that Plaintiff has not yet responded to the request for evidence. Plaintiffs’ counsel informed Defendants’ counsel

that Plaintiff expects to submit the response within the next couple of weeks. Upon receipt of a response to the request, USCIS will resume processing the applications at issue. USCIS expects that, by October 17, 2022, it will have either completed adjudicating the applications, rendering the lawsuit moot, or at least be in a significantly better position to determine what additional steps may be necessary before completing adjudication. Plaintiffs do not oppose this extension request. Therefore, Defendants respectfully move the Court for a 60-day extension of time to answer or otherwise respond to Plaintiffs' complaint, from August 17, 2022 to October 17, 2022.

Respectfully submitted,

CHAD E. MEACHAM
UNITED STATES ATTORNEY

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Attorneys for Defendants

Certificate of Conference

I certify that, on August 3, 2022, I conferred with Plaintiffs' counsel regarding this motion, and counsel stated that Plaintiffs do not oppose the motion.

/s/ Lisa R. Hasday
Lisa R. Hasday
Assistant United States Attorney

Certificate of Service

On August 3, 2022, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Lisa R. Hasday
Lisa R. Hasday
Assistant United States Attorney